

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	No. 3:24-CR-00151
)	
v.)	
)	
MATTHEW KNOOT)	

MATTHEW KNOOT’S NOTICE OF EXPERT WITNESS TESTIMONY

Pursuant to Fed. R. Crim. P. 16, the defense intends to call an expert in computer forensics at the upcoming trial. Specifically, the defense intends to call Luis Castrillon as an expert in the field of computer forensics. Mr. Castrillon holds a Bachelor of Science in Criminal Justice from Jacksonville State University and a Master of Science in Forensic Science from the University of New Haven. He holds the certification of Certified Forensic Computer Examiner (CFCE) which was issued by the International Association of Computer Investigative Specialists (IACIS). IACIS is a professional organization dedicated to training and certifying its members. The CFCE is an internationally recognized certification.

The defense expects Mr. Castrillon will testify regarding the forensic analysis on various types of digital media in general and as related to this case. He will testify to the collection, examination, preservation, and presentation of digital evidence.

A. Opinions, Basis, and Reasons for Opinions

1. Mr. Castrillon will discuss every stage of the process of imaging digital devices, including computers, laptops, and cellular devices. He will discuss the methodologies that prevent evidence from being changed, altered, or corrupted.
2. He may testify concerning the procedures to follow in the collection and preserving of digital evidence.

3. He will testify to what a virtual private network (“VPN”) is and describe how it functions, the common purpose for using a VPN, transferring data via VPN, and the overall security features of a VPN. He will further describe the different types of VPNs that are primarily used in common digital spaces.
4. Mr. Castrillon will testify and explain what an IP address is and how it is used by digital devices to send and receive information across the internet, how it can be used to track the users of those devices, and the interaction between IP addresses and VPNs.
5. He will testify regarding what remote desktop usage is and the common software applications installed on devices to allow use. He will discuss how those applications affect the devices they are installed on and how the application interacts with VPNs and IP addresses.
6. He will testify to his digital review of the devices the FBI seized from Mr. Knoot’s home which include Mr. Knoot’s personal laptop, his cellular device, and the victim laptops in question. He will further discuss his findings on critical digital evidence such as emails, data logs, and file histories that may be stored on the devices and the methods he followed to reach his conclusions.
7. He will testify to any documents produced from electronic sources via the devices he examined including but not limited to, log files, user access histories, user account information, user account information including security levels and access control lists, and user account information including usernames, account types, and passwords.

8. In regard to Mr. Knoot's personal cellular device, Mr. Castrillon may testify to the underlying extraction process used to extract data from the device, all stored SMS, MMS content and/or browser cache, call detail records including originations, terminations, call attempts, and voice and text message transactions.

B. Qualifications

1. Mr. Castrillon's curriculum vitae is attached to this disclosure and details his training and experience. (Attachment A)

C. Prior Courtroom Testimony

1. Mr. Castrillon has provided in-court expert testimony in the past year as indicated in the attached curriculum vitae.

D. Signature of Witness

1. I, Luis Castrillon, have reviewed the foregoing disclosure and approve of the contents contained herein.



LUIS CASTRILLON, M.S.

Respectfully submitted,

s/ David Fletcher

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CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2025, I electronically filed the foregoing Expert Witness Disclosure with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Joshua A. Kurtzman, Assistant United States Attorney, 719 Church Street, Suite 3300, Nashville, Tennessee, 37203.

s/ *David Fletcher*
DAVID FLETCHER